

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SureFunding, LLC,

Debtor.

Chapter 11

Case No. 20-10953 (LSS)

Re: D.I. 24, 56, 156, 164

**NOTEHOLDERS' SUPPLEMENTAL OBJECTION TO DEBTOR'S APPLICATION
FOR ENTRY OF AN ORDER AUTHORIZING AND APPROVING RETENTION OF
GAVIN/SOLMONESE LLC**

Noteholders¹ hereby file this Supplemental Objection to Debtor's Application for Entry of an Order Authorizing and Approving the Employment of Gavin/Somonese [D.I. 24, 156, 164] (the "Application") and state as follows in support thereof:

1. First, Debtors have failed to give proper notice of the hearing on the application and, if this Court is inclined to hear the application, a proper notice and objection period should be provided.
2. Second, Noteholders renew their original objection to the Application at D.I. 56.

¹ "Noteholders" are Brett Hatton, an individual; Earl Coronel, an individual; Autumn Wind Global Multi-Strategies Fund, LP, a Delaware Limited Partnership; Damon Gersh, an individual; Jason Eckenroth, an individual; Sherri R. Sands, as trustee of the Sherri R. Sands Revocable Trust, a Florida Trust; Glickfield Capital Management, LLC fbo M. Glickfield Dynasty Trust, a Maryland Trust; Glickfield Capital Management, LLC fbo Cheryl Newmark, a Maryland Trust; Glickfield Capital Management, LLC fbo Marla Schram, a Maryland Trust; Carrickfergus Investments Limited, a British Virgin Islands Company; Stephane Carnot, as Trustee of the Carnot Family Trust, a District of Columbia Trust; Dorsey and Whitney Trust Co., LLC, as Trustee of the Dylan Taylor 2011 Grantor Trust, a South Dakota Trust; Esecos, LLC, a Michigan Limited Liability Company; Sequis Group, LLC, a Michigan Limited Liability Company; Matthew Briggs, as Trustee of the Briggs Management Trust; Michael Rubenstein, an individual; June Farmer, an individual; Thomas Carl Myers, an individual; Richard L. Rogers, an individual; Neal J. Glickfield, as Trustee of the Neal J. Glickfield 2018 Trust, a Maryland Trust; Lineage, LLC, a Virginia Limited Liability Company; Charles B. Chokel, as Trustee of the Charles B. Chokel Trust u/a 4/21/92, a New Hampshire Trust; Brian Gray, an individual; HFJ Investments I, LLC, a Texas Limited Liability Company; Patricia B. Jones, as Trustee of the Patricia B. Jones Revocable Trust, a Maryland Trust; John B. Shaw as Trustee of the John B. Shaw 2012 Family Grantor Trust; and 1086 LLC, a Maryland Limited Liability Company.

3. Third, for the reasons set forth in their Motion to Convert this Case to Chapter 7 and the Reply in Support thereof, the Noteholders object to the retention sought in the Application.

WHEREFORE, Noteholders request that this Court deny the Application and grant them such other relief the Court deems just and appropriate or, if necessary, permit the parties to conduct discovery with respect to the relief sought in the Application.

Dated: October 13, 2022
Wilmington, Delaware

BLANK ROME LLP

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